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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MONIKA CASTRONOVA

Case No.: 2:18-cv-01786-RFB-PAL

Plaintiffs,

VS.

CREDIT ONE BANK; PENNYMAC LOAN SERVICES LLC; WELLS FARGO DEALER SERVICES; EXPERIAN INFORMATION SOLUTIONS, INC.; EQUIFAX INFORMATION SERVICES LLC; and TRANSUNION LLC.

**THIRD STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION TO DISMISS
[THIRD REQUEST]**

Defendants.

1 Plaintiff Monika Castranova (“Plaintiff”), by and through her counsel of record, and
2 Defendant TransUnion LLC (“Trans Union”) have agreed and stipulated to the following:
3

- 4 1. On September 14, 2018, Plaintiff filed a Complaint [ECF Dkt. 1].
5 2. On October 31, 2018, Trans Union filed a Motion to Dismiss the Complaint [ECF
Dkt. 26].

6 3. Plaintiff’s Response was originally due on November 14, 2018.
7 4. The Court granted Plaintiff and Trans Union’s first stipulation to extend time for
8 Plaintiff’s Response to November 28, 2018 [ECF Dkt. 36].
9

10 5. Plaintiff and Trans Union then requested another fourteen-day extension due to
11 continued settlement discussions on November 27, 2018 [ECF Dkt. 39]. The Court granted
12 Plaintiff and Trans Union’s second stipulation to extend time for Plaintiff’s Response to December
13 12, 2018 [ECF Dkt. 41].
14

15 6. Plaintiff has been diligently trying to procure a current copy of her Trans Union
16 consumer disclosure. On November 9, 2018, she was told by Trans Union that her report would
17 be mailed in 6-8 days. As of December 10, 2018, she still had not received her report, so she called
18 Trans Union again to follow up. Although she spoke with several representatives on the phone,
19 none were able to give her a time frame by which to expect her report. However, Plaintiff and
20 Trans Union believe an additional fourteen days should be sufficient to obtain this disclosure. This
21 disclosure is highly relevant to Plaintiff’s amended complaint, and as such, Plaintiff requires more
22 time to obtain it. As a result, both Plaintiff and Trans Union hereby request this Court to further
23 extend the date for Plaintiff to respond to Trans Union’s Motion to Dismiss Complaint until
24 **December 26, 2018.** This stipulation is made in good faith, is not interposed for delay, and is not
25 filed for an improper purpose.
26

27 THIRD STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO
28 DISMISS [THIRD REQUEST] - 2

1 IT IS SO STIPULATED.
2 Dated December 11, 2018.

<p>3 <u>/s/ Shaina R. Plaksin</u> 4 Matthew I. Knepper, Esq. 5 Nevada Bar No. 12796 6 Miles N. Clark, Esq. 7 Nevada Bar No. 13848 8 Shaina R. Plaksin, Esq. 9 Nevada Bar No. 13935 KNEPPER & CLARK LLC Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com Email: shaina.plaksin@knepperclark.com</p> <p>10</p> <p>11 David H. Krieger, Esq. 12 Nevada Bar No. 9086 13 HAINES & KRIEGER, LLC Email: dkrieger@hainesandkrieger.com <i>Counsel for Plaintiff</i></p>	<p>3 <u>/s/ Jason G. Revzin</u> 4 Jason G. Revzin, Esq. 5 Nevada Bar No. 8629 6 LEWIS, BRISBOIS, BISGAARD & SMITH 7 6385 S. Rainbow Blvd., Ste. 600 8 Las Vegas, NV 89118 9 Email: jason.revzin@lewisbrisbois.com <i>Counsel for Defendant Trans Union LLC</i></p>
<p>14 SNELL & WILMER LLP 15 16 <u>/s/ Kiah Beverly-Graham</u> 17 Kelly H. Dove, Esq. 18 Nevada Bar No. 6103 19 Kiah D. Beverly-Graham, Esq. 20 Nevada Bar No. 11916 21 3883 Howard Hughes Pkwy. 22 Las Vegas, NV 89169 Email: kdove@swlaw.com Email: kbeverly@swlaw.com <i>Counsel for Defendant Wells Fargo Bank, N.A., (incorrectly sued as Wells Fargo Dealer Services)</i></p>	<p>14 NAYLOR & BRASTER 15 16 <u>/s/ Andrew J. Sharples</u> 17 Jennifer L. Braster, Esq. 18 Nevada Bar No. 9982 19 Andrew J. Sharples, Esq. 20 Nevada Bar No. 12866 21 1050 Indigo Drive, Suite 200 22 Las Vegas, NV 89145 Email: jbraster@nblawnv.com Email: asharples@nblawnv.com JONES DAY 23 Katherine A. Neben, Esq. 24 Nevada Bar No. 14590 25 3161 Michelson Drive Irvine, CA 92612 Email: kneben@jonesday.com <i>Counsel for Defendant Experian Information Solutions, Inc.</i></p>

ORDER GRANTING

**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO
MOTION TO DISMISS**

IT IS SO ORDERED.

E. D. G. W.

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 12th day of December, 2018.